

FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983  
**IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**COMPLAINT**

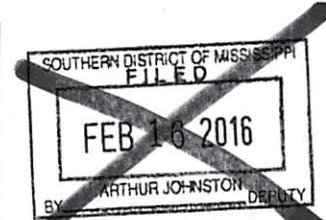
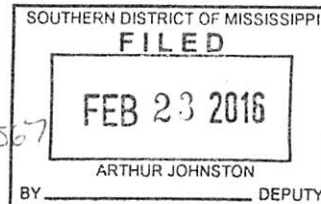
L. J. Williams NA295  
 (Last Name) (Identification Number)

RANDALL Alan  
 (First Name) (Middle Name)

Jackson County, Adult Detention Center  
 (Institution)

65 Bruce EVANS, LHM Pascagoula, MS, 39567  
 (Address)  
 (Enter above the full name of the plaintiff, prisoner, and address  
 plaintiff in this action)

Donald EDWARD Tomlin #122840



CIVIL ACTION NUMBER:

1:16cv01 HSO-JCG  
 (to be completed by the Court)

v.  
County of Jackson, Mississippi Et Al  
Captain "Mike Wright"  
Officer "Wendy Nevais"  
Sheriff "Mike Ezell"  
 (Enter above the full name of the defendant or defendants in this action)

"DEMANDING Jury Trial"

**OTHER LAWSUITS FILED BY PLAINTIFF****NOTICE AND WARNING:**

The plaintiff must fully complete the following questions. Failure to do so may result in your case being dismissed.

- A. Have you ever filed any other lawsuits in a court of the United States? Yes ☒ No ( )
- B. If your answer to A is yes, complete the following information for each and every civil action and appeal filed by you. (If there is more than one action, complete the following information for the additional actions on the reverse side of this page or additional sheets of paper.)

- Parties to the action: \_\_\_\_\_
- Court (if federal court, name the district; if state court, name the county): Both in  
Southern District of Mississippi
- Docket Number: (16S-cv-137-LG-RHW) & (1:15-cv-375-HSO)
- Name of judge to whom case was assigned: Williams Robert H. Walker H.S.O. Tomlin
- Disposition (for example: was the case dismissed? If so, what grounds? Was it appealed? Is it still pending?):  
Both PLAINTIFFS HAVE A PENDING CASE. (Active)

**PARTIES**

(In item I below, place your name and prisoner number in the first blank and place your present address in the second blank. Do the same for additional plaintiff, if any).

I. Name of plaintiff: RANDALL ALAN WILLIAMS Prisoner Number: 112398  
 Address: DONALD EDWARD TOMLIN 122840  
65, Bruce EVANS LN, PASCAGOULA, MS, 39567

(In item II below, place the full name of the defendant in the first blank, his official position in the second blank, and his place of employment in the third blank. Use the space below item II for the names, positions, and places of employment of any additional defendants.)

II. Defendant: County of Jackson, Mississippi Et. Al, is employed as  
Captain Mike WRIGHT & Officer Wendy NEVAIS at Jackson  
County A.D.C., 65, Bruce EVANS LN, 39567

The plaintiff is responsible for providing the court the name and address of each plaintiff(s) as well as the name(s) and address(es) of each defendant(s). Therefore, the plaintiff is required to complete the portion below:

**PLAINTIFF:**

NAME:	ADDRESS:
<u>RANDALL ALAN WILLIAMS</u>	<u>65, Bruce EVANS LN</u>
<u>DONALD EDWARD TOMLIN</u>	<u>PASCAGOULA, MS, 39567</u>

**DEFENDANT(S):**

NAME:	ADDRESS:
<u>County of Jackson, Mississippi Et. Al</u>	<u>65, Bruce EVANS LN, PASCAGOULA, MS,</u>
<u>MIKE WRIGHT</u>	<u>39567,</u>
<u>WENDY NEVAIS</u>	<u>SAME</u>
<u>MIKE EZEEL</u>	

**GENERAL INFORMATION**

- A. At the time of the incident complained of in this complaint, were you incarcerated because you had been convicted of a crime?  
Yes (X) No ( )
- B. Are you presently incarcerated for a parole or probation violation?  
Yes ( ) No (X)
- C. At the time of the incident complained of in this complaint, were you an inmate of the Mississippi Department of Corrections (MDOC)?  
Yes (X) No ( )
- D. Are you currently an inmate of the Mississippi Department of Corrections (MDOC)?  
Yes (X) No ( )
- E. Have you completed the Administrative Remedy Program regarding the claims presented in this complaint?  
Yes ( ) No ( ), if so, state the results of the procedure: These Claims are from a County Jail, Dozens of Grievances were filled. The A.R.R. is not applicable in this situation.
- F. If you are not an inmate of the Mississippi Department of Corrections, answer the following questions:
- Did you present the facts relating to your complaint to the administrative or grievance procedure in your institution?  
Yes (X) No ( )
  - State how your claims were presented (written request, verbal request, request for forms): Dozens of Grievances filled over the course of several months, dozens of request forms to be moved, dozens of maintenance forms.
  - State the date your claims were presented: AND DOZENS of verbal request from OFFICERS to ADMINISTRATOR  
All Grievances were ignored & Denied.
  - State the result of the procedure: We were being punished for who we were.  
All our request were denied.

**STATEMENT OF CLAIM**

- III. State here as briefly as possible the facts of your case. Describe how each defendant is involved. Also, include the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of different claims, number and set forth each claim in a separate paragraph. (Use as much space as you need; attach extra sheet if necessary.)

SEE PAGE(5)

**RELIEF**

- IV. State what relief you seek from the court. Make no legal arguments. Cite no cases or statutes.

The Plaintiffs would like to be awarded Damages including Compensatory and punitive, monetary compensation in the Defendants individual capacity. The Plaintiffs would also ask for the Defendants to be removed from their "Authoritive Capacity" over ANY AND ALL humane conditions within the Jackson County, mississippi's Sherriff Department.

Signed this 12 day of JANUARY, 2016.

651 Bruce EVANS LN, PASCAJOLA, MS, 39507  
Randall H. Hutto 012398 / Daniel Butler  
 Signature of plaintiff, prisoner number and address of plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

1-12-2016  
 (Date)

Randall H. Hutto / Daniel Butler  
 Signature of plaintiff

U.S. District Court  
Southern District of Mississippi  
Southern Division

RANDALL ALAN WILLIAMS #19398

Donald Edward Tomlin #122840

Plaintiffs

V.

Civil #

County of Jackson, Mississippi Et Al

Defendants

42 U.S.C. § 1983 Complaint: With "Jury DEMAND"

Jurisdiction:

The INSTANT CASE ARISES out of violations committed by the Defendants, of the Constitution, Statutes and treaties of the UNITED STATES. The Plaintiffs' Claims "ARISE" out of the SAME transaction, OCCURRENCE, or SERIES of Transactions or Occurrences" AND IF "ANY QUESTION of law or FACT Common to ALL PLAINTIFFS will ARISE in the Action. The PLAINTIFFS Allege ALL CLAIMS arise from the same NUCLEUS of FACTS thereby GIVING this Court the legal Authority to resolve both CLAIMS in one suit. The PLAINTIFFS "DEMAND A Jury Trial!"

The Court has Jurisdiction over the PLAINTIFFS CLAIMS of Violation of the Federal Constitutional Rights under 42 U.S.C. § 1331 (1) AND 1343.

1/s/ Randall Williams  
 RANDALL ALAN WILLIAMS  
 Prose PLAINTIFF

1/s/ Donald Tomlin  
 DONALD EDWARD TOMLIN  
 Prose PLAINTIFF

1-8-2015  
 DATE



STATEMENT OF CURIN(1) COUNTY OF JACKSON, MISSISSIPPI ET. AL,

COUNTY JAIL INMATES WERE FORCED TO LIVE IN VERY POOR, UNSANITARY, HAZARDOUS AND WAS LIFE THREATENING CONDITIONS BECAUSE THE COUNTY JAIL COMPLETELY IGNORED ALL OF THE COUNTY JAIL'S MAINTENANCE PROBLEMS. THE PLAINTIFFS IN THIS CASE WERE FORCED TO LIVE IN THESE CONDITIONS ON OR AROUND 9-10-2015 TO 12-4-2015 THE CONDITIONS ~~THE~~ PLAINTIFFS LIVED IN, IN THE HOUSING ZONE (K-E) WERE

(A) NO LIGHTS IN ANY OF THE CELLS, THERE ARE OLD ASBESTOS COATED WIRES THAT HANG DOWN WHERE THE LIGHT FIXTURES WERE, WE WERE FORCED TO BREATHE.

(B) THERE WAS WATER POURING OUT IN THE FLOORS OF THE CELLS FROM BUSTED & DETERIORATED PIPES IN THE WALLS THEY WOULD NOT FIX, BECAUSE IT WAS CROWDED THE PLAINTIFFS WERE FORCED TO SLEEP ON THE FLOORS, WITH WET MOLDY MATTS, ALONG WITH WET BLANKETS, AND WET CLOTHING. BECAUSE OF DETERIORATED PIPES, THE TOILETS WERE BROKE, THEREFORE THEY WERE FILLED WITH URINE THAT COULD NOT BE FLUSH, WHICH WAS UNSANITARY. DURING THE END OF OCTOBER 2015 AND NOVEMBER 2015 THE PLAINTIFFS WERE FORCED TO SLEEP ON WET FLOORS WHEN THE TEMPERATURES WERE IN THE 30'S AND 40'S, BECAUSE ADMINISTRATION WOULD NOT TURN ON

(C) THE HEATER, CAUSING A LIFE THREATENING SITUATION. THERE WAS NO HOT WATER IN THE SHOWER, WHICH WAS SOME OF THE INMATES ONLY SOURCE OF WATER, BECAUSE THERE SINKS IN THE CELLS WERE BROKE FROM DETERIORATED PIPES IN THE WALLS THEY WOULD NOT FIX.

(D) THE ONLY ENTRANCE AND EXIT DOOR TO (K-E) WAS BROKE. OFFICERS WOULD HAVE TO BEAT, KICK, PULL AND PRY OPEN WITH A CROWBAR. THE DOOR TAKING SEVERAL MINUTES TO OPEN CREATING A **LIFE** THREATENING SITUATION.

(E) THEREFORE THE PLAINTIFFS ASSERT THEY WERE MENTALLY AND PHYSICALLY TORTURED BY BEING FORCED TO LIVE IN THESE POOR AND HAZARDOUS LIFE THREATENING CONDITIONS AT THE JACKSON COUNTY, MISSISSIPPI COUNTY JAIL FROM (9-10-2015 TO 12-4-2015.

(6)

STATEMENT OF CLAIM

- (2.) SHERIFF MIKE EZELL: IS THE "HEAD OFFICALL" OF THE JACKSON COUNTY, MISSISSIPPI ADULT DETENTION CENTER. HE WAS AWARE OF THE DETERIORATED LIVEING CONDITIONS AND ADMINISTRATIVE PRACTICES AT THE JACKSON COUNTY, MISSISSIPPI ADULT DETENTION CENTER. IN 2015 AND DID NOTHING TO CORRECT ITS CONDITIONS AND ARBITRARY PUNISHMENTS. THEREFORE HIS FAILURE TO ACT AND PROVIDE ADEQUATE LIVEING CONDITIONS SUBJECTING THE PLAINTIFF TO UNFAIR MENTALL AND PHYSICALL CONDITIONS ARE UNCONSTITUTIONALL. His Actions Were Done "In His" Individual Capacity."
- (3.) THE PLAINTIFFS NOW ASSERT "CAPTIN MIKE WRIGHT" IS THE JACKSON COUNTY MISSISSIPPI ADULT DETENTION CENTER JAIL ADMINISTRATOR. HE HAD COMPLETE KNOWLEDGE OF ALL THE POOR, UNSANITARY, HAZORDOUS LIVEING CONDITIONS IN (K-E) AND DESPITE DOZENS OF GREIVANCES AND MAINTENCE REPORTS, AND WRITTEN AND VERBAL REQUEST HE DID NOT ACT ON REMEDYING THE SITUATION. HE MALICIOUS AND SADISTICALLY USED THE ZONE (K-E) AS A "PUNISHMENT" ZONE TO INMATES, DEPENDING ON EITHER WHO YOU WERE, WHAT YOUR CHARGE WAS, OR IF YOU WERE HOUSED IN ANOTHER "STATE SIDE ZONE" AND GOT IN TROUBLE. YOU WERE SENT TO (K-E) TO BE PUNISHED. HE WOULD ALSO LOCK DOWN THE WHOLE ZONE FOR DAYS AT A TIME OR HOURS AT A TIME. SUBJECTING THE PLAINTIFFS TO UNFAIR PHYSICALL AND MENTALL CONDITIONS. His Actions Were Done In his "Individual Capacity."

(4.) OFFICER "WENDY NEVALS" IS OVER CLASSIFICATION. SHE HAD COMPLETE KNOWLEDGE OF THE POOR, UNSANITARY, HAZARDOUS AND LIFE THREATENING CONDITIONS IN THE ZONE (K-E). SHE MOVED THE PLAINTIFFS TO (K-E) TO PUNISH THEM FOR EITHER WHO THEY WERE, WHAT THERE CHARGE WAS, OR IF THEY WERE IN ANOTHER STATE SIDE ZONE AND GOT IN TROUBLE. SUBJECTING THE PLAINTIFFS TO UNFAIR PHYSICALL AND MENTALL CONDITIONS. HER ACTIONS WERE DONE IN HER "INDIVIDUAL CAPACITY"

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. 28 U.S.C. § 1746.

SIGNED THIS 12 DAY OF JANUARY, 2016.

/s/ Danah E. Emelin  
SIGNATURE OF PLAINTIFF

/s/ Randell Williams  
SIGNATURE OF PLAINTIFF



RANDALL ALAN WRIGHT #W2398  
65, BRUCE EVANS, LANE  
PASADENA, MS, 39267

**WARNING**

This Correspondence is from a Inmate  
The Contents have not been evaluated  
and the JACKSON COUNTY ADULT  
DETENTION CENTER is not RESPONSIBLE  
for the substance or content  
of the enclosed Communication



To: Court Clerk, U.S. District Court  
501 E. Court Street, Suite 2.50C  
Jackson, MS, 39201

